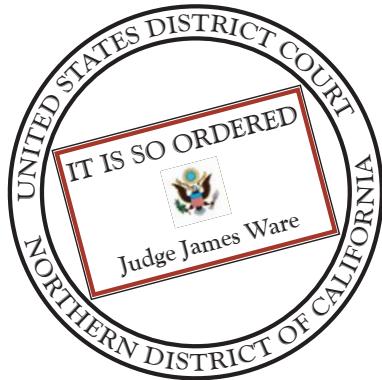


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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

13 In re UTSTARCOM, INC. SECURITIES) Master File No. C-04-4908-JW(PVT)
14 LITIGATION)
15 _____) CLASS ACTION
16 This Document Relates To:) STIPULATION REGARDING BRIEFING
ALL ACTIONS.) SCHEDULE (SOFTBANK Holdings Inc. and
) SOFTBANK America Inc.)
)

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1 WHEREAS, on July 26, 2005, lead plaintiffs Locals 302 and 612 of the International Union
2 of Operating Engineers-Employers Construction Industry Retirement Trust and Erwin DeBruycker
3 ("plaintiffs") filed their First Amended Consolidated Complaint for Violation of the Federal
4 Securities Laws ("Amended Complaint");

5 WHEREAS, defendants SOFTBANK Holdings Inc. and SOFTBANK America Inc.
6 ("defendants") have been duly served;

7 WHEREAS, defendants' answer is due on August 17, 2005;

8 WHEREAS, the parties have met and conferred and have agreed, subject to the approval of
9 the Court, to a briefing schedule for defendants' response to the Amended Complaint; and

10 WHEREAS, on July 27, 2005, this Court approved a stipulation between plaintiffs and the
11 UTStarcom defendants setting forth the same briefing schedule;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED, pursuant to Civil L.R. 7-12, that:

13 1. Defendants shall file their response to the Amended Complaint on or before
14 October 10, 2005;

15 2. Should defendants file a motion to dismiss, plaintiffs shall file their opposition thereto
16 on or before November 23, 2005;

17 3. Defendants shall file any reply in support of its motion to dismiss on or before
18 December 22, 2005; and

19 4. The hearing on defendants' motion to dismiss shall be set for Monday, January 9,
20 2006, at 9:00 a.m.

21 | DATED: August 18, 2005

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/S/
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7 DATED: August ___, 2005

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9
10 /S/
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14 Attorneys for Defendant SOFTBANK Holdings
15 Inc. and SOFTBANK America Inc.

16 * * *

17 **O R D E R**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 DATED: 8/22/05

20 /s/ James Ware
21 THE HONORABLE JAMES A. WARE
22 UNITED STATES DISTRICT JUDGE

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DECLARATION OF SERVICE BY MAIL AND FACSIMILE

I, the undersigned, declare:

3 1. That declarant is and was, at all times herein mentioned, a citizen of the United States
4 and employed in the City and County of San Francisco, over the age of 18 years, and not a party to
5 or interested party in the within action; that declarant's business address is 100 Pine Street,
6 Suite 2600, San Francisco, California 94111.

7 2. That on August 18, 2005, declarant served the **STIPULATION REGARDING**
8 **BRIEFING SCHEDULE (SOFTBANK HOLDINGS INC. AND SOFTBANK AMERICA**
9 **INC.)** by depositing a true copy thereof in a United States mailbox at San Francisco, California in a
10 sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached
11 Service List. Declarant also served the parties by facsimile.

12 3. That there is a regular communication by mail between the place of mailing and the
13 places so addressed.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th
15 day of August, 2005, at San Francisco, California.

/S/
JERRY COHEN

UTSTARCOM 04 (CA) (LEAD)
Service List - 8/18/2005 (04-0558C)
Page 1 of 1

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